

Federal Communications Commission
236 Massachusetts Ave, NE Suite 110
Washington, DC 20002

February 22, 2004

Dear Commission Secretary:

The National Rural Health Association (NRHA) represents over 5,000 rural health providers across the country. Many of our members are current users of the Universal Service Rural Health Care program and have experienced the benefits of this important program.

We are submitting comments in response to the FCC's enquire regarding the definition of rural. Over the years, our members have learned that "when you see one rural community, you've seen one rural community." In other words, there is no one rural definition that works to define the diversity and complexity of America's rural communities.

At the NRHA National Rural Policy Council held on February 22, 2004 in Washington, DC, the Council voted to support a definition of rural that was as broad and inclusive as possible. Specifically, we supported states that have their own definition of rural, and we supported the variety of rural definitions that are currently being used by numerous federal agencies.

Many of our members were particularly concerned that the FCC not use the Rural Urban Commuting Area (RUCA) system as the sole criteria for defining "rural". Some rural areas of the country do not meet the rural criteria under RUCA, even though they may be defined rural under some other methodology.

We urge the FCC to allow organizations to use whatever state or federal rural definitions best fits their unique circumstances. We are confident that both the states and the many federal agencies that have thought through this process have developed thoughtful criteria that reflect the diversity of their rural communities. To encourage broad participation in the Rural Health Care Universal Service Program, we urge the FCC to not force a "one-size-fits-all" definition of rural, but to recognize the rural definitions crafted by states and other federal programs, as well as RUCA, in determining eligibility for this program.

Sincerely,

David Sniff, President
National Rural Health Association